

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION, CENTER
FOR CONSTITUTIONAL RIGHTS, PHYSICIANS
FOR HUMAN RIGHTS, VETERANS FOR COMMON
SENSE, and VETERANS FOR PEACE,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE et al.,

Defendants.

No. 1:04-CV-4151 (AKH)

**NOTICE OF PLAINTIFFS'
SEVENTH MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiffs American Civil Liberties Union, Center for Constitutional Rights, Physicians for Human Rights, Veterans for Common Sense, and Veterans for Peace hereby move for partial summary judgment and an order requiring the government to disclose images of prisoner abuse withheld under the Freedom of Information Act, 5 U.S.C. § 552, or, in the alternative, to provide Plaintiffs with a *Vaughn* index and declaration that describes each photograph in detail and sets out the government's reasons for concluding that release of each photograph would endanger U.S. citizens, service members, or employees.

January 14, 2014

Respectfully submitted,

/s/ Marcellene E. Hearn

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